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March 21, 2014

**VIA ECF**

Hon. George B. Daniels  
United States District Judge  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: *Sokolow, et al. v. Palestinian Liberation Organization, et al.*  
Docket No. 04-CV-397 (GBD)(RLE)

Dear Judge Daniels:

This firm represents plaintiffs in the above-referenced action.

On January 22, 2014, the parties submitted for the Court's consideration a Joint Pretrial Order ("JPTO") in this matter, including exhibit lists. At that time, plaintiffs "reserve[d] the right to add any documents produced on or after January 21, 2014 pursuant to Federal Rule of Civil Procedure 26(e) or order of the Court." JPTO at 30.

Following the submission of the JPTO, plaintiffs identified 81 additional documents and videos that we wish to designate as trial exhibits. We have added those exhibits to plaintiffs' Amended and Supplemental Exhibit List ("Amended and Supplemental Ex. 3-1") (copy attached). The 81 additional exhibits on Amended and Supplemental Ex. 3-1, which have been designated as Plaintiffs' Exhibits 1028 to 1108, fall into three categories:

1. Documents produced late by defendants, including documents that were produced on the eve of, or in some instances after, the day that the parties submitted the JPTO to the Court for its consideration;
2. Documents in response to defendants' Motion for Reconsideration on the issue of personal jurisdiction, which defendants filed on January 31, 2014; and

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3. Documents that plaintiffs located and produced after the parties submitted the JPTO, some of which did not exist prior to January 22, 2014.

In addition to supplementing our exhibit list with these 81 exhibits, Amended and Supplemental Ex. 3-1 differs from our January 22, 2014 proposed Ex. 3-1 in two non-substantive ways. *First*, on the new list, we have indicated that certain exhibits, which were duplicates of others, have been “Intentionally Omitted.” *Second*, we have made limited proofreading edits to the descriptions of certain exhibits.

Finally, we note that Amended and Supplemental Ex. 3-1 does not indicate any stipulations by defendants concerning either admissibility or authenticity of exhibits 1028 to 1108. We requested that defendants indicate any such stipulations to these exhibits pursuant to Your Honor’s Individual Practices; however, defendants have not provided their response at this time.

We respectfully request that Your Honor replace the version of proposed Exhibit 3-1 as submitted on January 22, 2013 with the attached Amended and Supplemental Exhibit List, and enter the Supplemental List into the approved Joint Pretrial Order.

Respectfully,

Kent A. Yalowitz

cc: All ECF Counsel